

FILED

FEB 13 2014

**RICHARD W. WIEKING
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

MELINDA HAAG (CABN 132612)
United States Attorney

J. DOUGLAS WILSON (DCBN 412811)
Chief, Criminal Division

ACADIA L. SENESE (CABN 251287)
Assistant United States Attorney

450 Golden Gate Avenue, Box 36055
San Francisco, California 94102-3495
Telephone: (415) 436-6809
FAX: (415) 436-7234
- acadia.senese@usdoj.gov

Attorneys for United States of America

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)	No. CR 13-0287 JST
)	
v.)	
)	STIPULATION AND PROPOSED ORDER TO
)	CONTINUE CHANGE OF PLEA HEARING
)	
BRADY BELL, et al.,)	
)	
Defendant.)	

The above-captioned matter is set on February 14, 2014 at 2:00 p.m. before this Court for a change of plea. However, despite the parties' best efforts to resolve this matter expeditiously, the parties need additional time to confer and the government needs additional time to secure the requisite approvals for a proposed disposition. Undersigned counsel conferred with the Court's deputy clerk and the earliest next available date that is agreeable to all a parties is March 28, 2014 at 9:30 a.m.. Accordingly, the parties hereby stipulate to continue the status conference from February 14, 2014 to March 28, 2014 at 9:30 a.m.

The parties further stipulate and agree that the ends of justice served by this continuance outweigh the best interest of the public and the defendant in a speedy trial. The parties agree that the failure to grant this continuance would unreasonably deny defendant effective preparation of counsel.

STIPULATION AND ~~PROPOSED~~ ORDER TO CONTINUE CHANGE OF PLEA HEARING
CR 13-0287 JST

1 Accordingly, the parties agree that the period of time from February 14, 2014 to March 28, 2014 should
2 be excluded in accordance with the provisions of the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A).

3 DATED: February 13, 2014

Respectfully submitted,

4 MELINDA HAAG
5 United States Attorney

6
7 /S/
8 ACADIA L. SENESE
9 Assistant United States Attorney

10 DATED: February 13, 2014

11 /S/
12 GAIL SHIFMAN
13 Counsel for Mr. Brady Bell

14 **ORDER**

15 Based on the reasons provided in the stipulation of the parties above, IT IS HEREBY
16 ORDERED that the hearing date of February 14, 2014, scheduled at 2:00 p.m., is vacated and reset to
17 March 28, 2014, at 9:30 a.m. for a change of plea hearing. It is FURTHER ORDERED that time is
18 excluded pursuant to the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A), from February 14, 2014 to March
19 28, 2014, for effective preparation of counsel.

20 DATED: 2/13/14

21 
22 HONORABLE JON S. TIGAR
23 United States District Judge